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Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

A-DEC, INC., an Oregon corporation,

PLAINTIFF,

v.

**W&H DENTALWERK BÜRMOOS GES.
M.B.H., an Austrian private limited liability
company,**

DEFENDANT.

Case No. 3:20-cv-01679-AC

**DEFENDANT'S UNOPPOSED
MOTION TO EXTEND TIME TO FILE
RESPONSE TO COMPLAINT**

LR 7-1 CERTIFICATE OF COMPLIANCE

Defendant conferred with plaintiff's counsel regarding the subject of this motion, as required under Local Rule 7-1. Plaintiff does not oppose the extension of time requested herein.

MOTION

Defendant respectfully moves for an order under Fed. R. Civ. P. 6(b) extending the time in which it must respond to plaintiff's Complaint (Dkt. No. 1) until November 30, 2020.

The reason for the requested extension is that Defendant is investigating the factual and legal bases underlying the Complaint and actively working with plaintiff's counsel in pursuit of a

potential resolution of this matter. The additional time requested herein will allow the parties to explore further a potential resolution of the case while minimizing the expenditure of the parties' and the Court's resources.

This motion is made in good faith and not for purposes of delay, and without waiver of or prejudice to any defense, including but not limited to any that may be raised in a responsive pleading or motion under Fed. R. Civ. P. 12.

DATED this 2nd day of November, 2020.

DAVIS WRIGHT TREMAINE LLP

By s/ P. Andrew McStay, Jr.

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